

Etzig, Trista

From: hvantol@ruralinc.org
Sent: Wednesday, May 17, 2006 11:58 AM
To: Scblockgrants,
Subject: Docket No. FV06-1290-1 PR
Attachments: ATTACHMENT.TXT

May 17, 2006

Docket Clerk, Fruit and Vegetable Programs
 Agricultural Marketing Service
 USDA
 1400 Independence Avenue, SW., Stop 0243,
 Washington, DC 20250-0243
 Fax: (202) 690-0102
 E-mail: scblockgrants@usda.gov

Re: Docket No. FV06-1290-1 PR

To Whom It May Concern:

In the April 20, 2006 Federal Register the USDA's Agricultural Marketing Service (AMS) proposes regulations to administer the Specialty Crop Block Grant Program (SCBGP) to enhance the competitiveness of specialty crops. This proposed rule is intended to establish eligibility and application requirements, the review and approval process, and grant administration procedures for the SCBGP.

Rural Opportunities Inc. favors this rule-making with the exception of one word in section 1290.4 titled Eligible Grant Projects. The proposed language is: "To be eligible for a grant, the project(s) must enhance the competitiveness of specialty crops. Priority will be given to **fresh** specialty crop projects." We do not believe that giving priority to "fresh" crops is necessarily in the public interest in all areas of the country and we urge you to allow states some flexibility in deciding their priorities. For instance the wineries in the Finger Lakes region of Upstate New York provide a specialty crop that is driving a great deal of the economic development of this section of rural New York that is considered quite economically distressed. We believe that marketing projects that benefit wineries would receive a lower priority if the rule were to pass in its current form, and we believe that increasing the economic viability of rural New York's wineries will increase opportunities for the clients that ROI serves.

Rural Opportunities, Inc. (ROI) was founded in 1969 in response to the critical needs of migrant and seasonal farm workers and other rural poor. ROI's mission is to create opportunities for the families and individuals we serve that will enable them to overcome barriers that prevent access to economic, educational, and social resources. With guidance from low-income individuals and communities, ROI develops and operates programs that create positive change for those it serves.

Rural Opportunities, Inc. has helped thousands of families take the first steps away from homelessness, farm labor camps, overcrowded and substandard housing, unemployment, and extreme poverty. It leads them to safe, affordable rental housing, adequate incomes and, in many cases, full time employment and home ownership.

5/17/2006

ROI provides services to over 30,000 families annually. Since its inception, ROI has strengthened communities through a myriad of rural development and service activities. ROI's housing and economic development programs foster partnerships between municipalities, private and public funders, community groups, residents, other non-profits and service organizations to develop affordable housing and small business assistance programs across New York, New Jersey, Pennsylvania, Ohio, Indiana and Puerto Rico. These partnerships have resulted in the development, improvement and preservation of over 5,200 affordable housing units since 1980. Since 1992, and additional 2,300 low and moderate income families have purchased their first home through ROI's Homeownership Assistance Program. Over half of these families are single parent, female-headed households with children.

To date, ROI's Economic Development Program has made over 250 loans for the creation and expansion of small business enterprises. These loans have led to the creation or retention of over 1,500 jobs in rural areas.

Other ROI programs focusing on farm workers include: Migrant Head Start and other programs for children, Youth and Adult Education, Employment and Training, Health and Safety Programs, Emergency and Support Services, and Public Initiatives and Advocacy. ROI's Adult Training and Employment programs help participants raise their average income from \$6,000 to \$18,000. Over 80% of these participants did not complete high school.

To better serve the rural communities of New York, ROI urges the USDA to drop the mandated prioritization of "fresh" products from this proposed rule, so that states like New York can have the flexibility to support the marketing of an economically important specialty crop product like wine.

Thank you very much

Sincerely,



Lee Beaulac
Senior VP for Community & Economic Development